

 ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA

: SUPERSEDING INFORMATION

- v. - : S1 16 Cr. 757 (NSR)

:
ROBERT GARNEAU,

: a/k/a "Raptorr427,"

: a/k/a "Bobby Sixx,"

:
Defendant.

- - - - - x

COUNT ONE

(Coercion and Enticement)

The United States Attorney charges:

1. Between in or about September 2014 up to and including on or about December 1, 2014, in the Southern District of New York and elsewhere, ROBERT J. GARNEAU, a/k/a "Raptorr427," a/k/a "Bobby Sixx," the defendant, using facilities and means of interstate and foreign commerce, unlawfully, willfully, and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, ROBERT J. GARNEAU, the defendant, while in Warwick, New York and in transit to Brookville, New York, communicated with a minor ("Victim-1") online and convinced Victim-1 to take and

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send sexually-explicit photographs of Victim-1 to GARNEAU, the defendant.

(Title 18, United States Code, Sections 2422(b) and 2427.)

COUNT TWO

(Coercion and Enticement)

The United States Attorney further charges:

2. On or about August 10, 2015, in the Southern District of New York and elsewhere, ROBERT J. GARNEAU, a/k/a "Raptor427," a/k/a "Bobby Sixx," the defendant, using facilities and means of interstate and foreign commerce, unlawfully, willfully, and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, ROBERT J. GARNEAU, the defendant, while in Warwick, New York, communicated with a minor ("Victim-2") online and asked Victim-2 to take and send sexually-explicit photographs of Victim-2 to GARNEAU, the defendant.

(Title 18, United States Code, Sections 2422(b) and 2427.)

COUNT THREE

(Coercion and Enticement)

The United States Attorney further charges:

3. On or about July 18, 2015, in the Southern District of New York and elsewhere, ROBERT J. GARNEAU, a/k/a "Raptor427," a/k/a "Bobby Sixx," the defendant, using

facilities and means of interstate and foreign commerce, unlawfully, willfully, and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, ROBERT J. GARNEAU, the defendant, while in Warwick, New York, communicated with a minor ("Victim-3") online and convinced Victim-3 to take and send sexually-explicit photographs of Victim-3 to GARNEAU, the defendant.

(Title 18, United States Code, Sections 2422(b) and 2427.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Counts One, Two and Three of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

- a) one black custom built PC Tower;
- b) one iPhone 5 Model # A1429;

- c) one iPhone 6S Model # A1688;
- d) one iPad Model # A1416;
- e) one Sony VAIO Laptop with serial number C603RJ7Z

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2428; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

John H. Kim
JOHN H. KIM
Acting United States Attorney